

From: Carlos Garcia Perez cgarciaperez@smgqlaw.com
Subject: Re: Doe v. Bonnell, S.D. Fla. Case No. 25-cv-20757-JB
Date: April 8, 2025 at 6:35 AM

CG

To: Andrew Brettler abrettler@berkbrettler.com, Joan S. Peters petersjoan@bellsouth.net
Cc: Angie Velando angie@smgqlaw.com, Robert "Bob" L. Raskopf Raskopf@bilzin.com, Patricia M. Patino Ppatino@bilzin.com, Carrie A. Goldberg carrie@cagoldberglaw.com, Roxanne Rimonte roxanne@cagoldberglaw.com, Jake Camara jcamara@berkbrettler.com, Kai Alblinger kalblinger@berkbrettler.com

Good morning I hope you are all doing well.

My apologies I did not realize that your deadline is Friday. I just got back from oral argument in Boston and I had my days confused. We are available to meet and confer on Wednesday and agree that "It is not out of the question that the parties may be able to stipulate to certain relief and avoid motion practice altogether."

As to your motion requesting an extension you can represent to the court that we do not oppose the motion because the parties are going to discuss possible stipulations to certain relief which may avoid the need for a preliminary injunction hearing .

Please let us know if you are available to discuss on Wednesday. Thank you.

Carlos A. Garcia Perez
Partner



SANCHEZ-MEDINA, GONZALEZ, QUESADA,
LAGE, GOMEZ & MACHADO LLP

201 Alhambra Circle | Suite 1205 | Miami, Florida 33134
Office: 305.377.1000 Ext. 145 | Fax: 855.327.0391
cgarciaperez@smgqlaw.com | SMGQLAW.com

From: Andrew Brettler <abrettler@berkbrettler.com>
Date: Monday, April 7, 2025 at 7:59 PM
To: Joan S. Peters <petersjoan@bellsouth.net>
Cc: Carlos Garcia Perez <cgarciaperez@smgqlaw.com>, Angie Velando <angie@smgqlaw.com>, Robert "Bob" L. Raskopf <Raskopf@bilzin.com>, Patricia M. Patino <Ppatino@bilzin.com>, Carrie A. Goldberg <carrie@cagoldberglaw.com>, Roxanne Rimonte <roxanne@cagoldberglaw.com>, Jake Camara <jcamara@berkbrettler.com>, Kai Alblinger <kalblinger@berkbrettler.com>
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Dear Ms. Peters:

On behalf of Mr. Bonnell, we intend to seek additional time from the magistrate judge to respond to Plaintiff's motion for a preliminary injunction. [ECF No. 21.] As you are aware, at the hearing on Friday, April 4, 2025, Judge Becerra denied Plaintiff's application for a temporary restraining order and indicated that she would refer the motion for preliminary injunction to Magistrate Judge Torres to set a briefing schedule. [ECF No. 32.] In light of Judge Becerra's comments at the hearing, noting, among other things, that Plaintiff's request for a TRO is "stale" given no present "emergency" or other exigent circumstances, the expedited briefing schedule that Magistrate Judge Torres set today [ECF No. 36] does not appear to be necessary. Please advise whether you will oppose our request for a brief one-week extension.

In addition, we would like to meet and confer with you regarding the scope of your preliminary injunction motion. It is not out of the question that the parties may be able to stipulate to certain relief and avoid motion practice altogether. Indeed, you alluded to that possibility in your earlier correspondence. While we understand based on your subsequent email below that you and Mr. Garcia Perez are "no longer available" to speak before Thursday, in light of our current opposition deadline of this Friday, April 11, we intend to file our motion for an extension tomorrow (Tuesday, April 8). We would urge you either to make time for a meet and confer conference or respond in writing by noon EDT tomorrow.

Thank you.

Sincerely,

Andrew B. Brettler | BERK BRETTLER LLP
9119 Sunset Blvd. | West Hollywood, CA 90069
O: +1.310.278.2111 | M: +1.917.620.2726

On Apr 7, 2025, at 1:12 PM, Joan peters <petersjoan@bellsouth.net> wrote:

Carlos and I are no longer available tomorrow or Wednesday. We are available on Thursday anytime before 1 pm EST. Please advise if this time frame works.
thanks,

On Apr 7, 2025, at 10:00 AM, Joan peters
<petersjoan@bellsouth.net> wrote:

Dear Counsel:

In compliance with the Local Rules we are requesting a meet

and confer regarding Plaintiff's potential motion for spoliation. In compliance with the Court's recommendation at the status conference on Friday, we would also like to meet and confer regarding Plaintiff's motion for injunctive relief in an effort to resolve issues prior to any hearing. We are available tomorrow and/or Wednesday. Please advise as to your availability on those days.
thank you.
Joan